

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor C. Stephen Allred, Director

February 20, 2004

Certified Mail No. 7099 3220 0009 1975 2805

Mr. Lloyd Casperson, President Charmac Trailers 452 South Park Ave. Twin Falls, Idaho 83303

RE:

Facility ID No. 083-00068, Charmac Trailers, Twin Falls

Final Tier II Operating Permit and Permit to Construct

Dear Mr. Casperson:

The Department of Environmental Quality (DEQ) is issuing Tier II Operating Permit and Permit to Construct No. T2-020412 to Charmac Trailers in accordance with IDAPA 58.01.01.400-461 and 200-228, Rules for the Control of Air Pollution in Idaho, respectively. Tier II Operating Permit and Permit to Construct No. T2-020412 is effective immediately and is based on your permit application submittals received on September 12, 2002, and January 8, February 18, April 14, and August 7, 2003.

Stephen VanZandt of the Twin Falls Regional Office will contact you regarding a meeting with DEQ to discuss the permit terms and requirements. In addition to your facility's plant manager, DEQ recommends the following representatives attend the meeting: your responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with the permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to call Bill Rogers at (208) 373-0502 to address any questions or concerns you may have with the enclosed permit.

If you have any questions about the enclosed permit or the permitting process, please contact Bill Rogers at (208) 373-0502 or wrogers@deq.state.id.us.

Sincerely,

Martin Bauer, Administrator

Martin Bawn

Air Quality Division

HE:sd

Permit No. T2-020412

Enclosure

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cc: Steve VanZandt, Twin Falls Regional Office
Bill Rogers, Permit Coordinator
Harbi Elshafei, AQ Division
Marilyn Seymore, (PF)
Pat Rayne, AFS
Joan Lechtenberg, Public Comment
Sherry Davis, AQ Division/SF
Laurie Kral, EPA Region 10
Permit Binder
Phyllis Heitman, (Ltr Only)
Reading File (Ltr Only)



## Air Quality TIER II OPERATING PERMIT

# And PERMIT TO CONSTRUCT

## State of Idaho Department of Environmental Quality

**PERMIT NO.: T2-020412** 

**FACILITY ID NO.: 083-00068** 

AQCR: 063

CLASS: B

SIC: 3715

**ZONE: 11** 

UTM COORDINATE (km): 706.2, 4713.8

#### 1. PERMITTEE

Charmac Trailers

#### 2. PROJECT

Facility-Wide Tier II Operating Permit and Permit to Construct

3. MAILING ADDRESS 452 South Park Avenue	CITY Twin Falls	STATE ZIP 83303	
4. FACILITY CONTACT Lloyd Casperson	TITLE President	TELEPHONE (208) 733-5241	
5. RESPONSIBLE OFFICIAL Lloyd Casperson	TITLE President	TELEPHONE (208) 733-5241	
6. EXACT PLANT LOCATION 452 South Park Avenue		COUNTY Twin Falls	

## 7. GENERAL NATURE OF BUSINESS and KINDS OF PRODUCTS

Recreational and transport trailer manufacturing facility

#### 8. PERMIT AUTHORITY

This permit to construct and Tier II operating permit is issued according to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200-228 and IDAPA 58.01.01.400-470. This permit pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be operated by this permit. Only the terms and conditions pertaining to Tier II operating permit requirements are subject to the expiration date of this permit.

This permit is not transferable to another person, place, or piece or set of equipment. This permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented in the application and the Department of Environmental Quality's (DEQ's) technical analysis of the supplied information. Changes in design or equipment that result in any change in the nature or amount of emissions may be considered a modification. Modifications are subject to DEQ review in accordance with IDAPA 58.01.01.200 et seq.

C. STEPHEN AVERED, DIRECTOR

DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED:

February 20, 2004

DATE EXPIRES:

February 20, 2009

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## ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

AIRS Aerometric Information Retrieval System

acfm actual cubic feet per minute

AQCR Air Quality Control Region

ASTM American Society of Testing and Materials

Charmac Charmac Trailers

cf/m cubic feet per minute

CO carbon monoxide

DEQ Department of Environmental Quality

EPA U.S. Environmental Protection Agency

gr/dscf grains per dry standard cubic foot

lb/day pounds per day

IDAPA a numbering designation for all administrative rules in Idaho promulgated under

the Idaho Administrative Procedures Act

K degrees Kelvin

km kilometer

m meter

NO<sub>x</sub> oxides of nitrogen

O&M operating and maintenance

PM particulate matter

PM<sub>10</sub> particulate matter with an aerodynamic diameter of 10 micrometers or less

SIC Standard Industrial Classification

SO<sub>2</sub> sulfur dioxide T/yr tons per year

UTM Universal Transverse Mercator

VOC volatile organic compound

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Location:	Twin Falls, Idaho	Facility ID No. 083-00068	Date Expires:	February 20, 2009

## 1. PERMIT SCOPE

## **Purpose**

1.1 This facility-wide permit establishes enforceable requirements to limit the facility's potential to emit to protect ambient air quality standards. This Tier II operating permit and permit to construct is required to satisfy the requirements of IDAPA 58.01.01 Subparts 400 et seq and 200 et seq, Rules for the Control of Air Pollution in Idaho.

## Regulated Sources

1.2 Table 1.1 below lists the sources that are regulated in this permit.

**Table 1.1 EMISSIONS SOURCES** 

Permit Section	Source Description	Emissions Control
2	FACILITY-WIDE CONDITIONS	
. 3	PAINT BOOTH NO. 1 Paint booth no. 1 has been in operation since 1979 and is used to apply black primer mixture (primer paint, catalyst, and reducer) and a black topcoat paint to trailer frames. This booth has one stack with the following parameters:  Height (m) = 4.88 Stack Temperature (K) = 293 Stack exit flow rate (cf/m) = 5,295 Stack diameter (m) = 1.38  PAINT BOOTH NO. 2 Paint booth no. 2 has been in operation since 1986 and is used to apply a white primer mixture (primer paint, catalyst, and reducer) and a white topcoat paint to trailer frames. This booth has two identical stacks. Each stack's parameters are as follows:  Height (m) = 4.57 Stack Temperature (K) = 293 Stack exit flow rate (cf/m) = 5,295, each Stack diameter (m) = 1.19	Particulate matter emissions from Paint booth no. 1 and from paint booth no. 2 are controlled by filters with the following specifications:  Paint booth no. 1  Manufacturer: Superior Glass Fibers, Inc. Type: Glass Fiber Paint Arrestor P  Model: TYB 26-300-22-00  Control Efficiency: 96%  Paint booth no. 2  Manufacturer: Superior Glass Fibers, Inc. Type: Glass Fiber Paint Arrestor P  Model: TYB 26-300-22-C-4-00  Control Efficiency: 96%

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## 2. FACILITY-WIDE CONDITIONS

## **Fugitive Emissions**

- 2.1 All reasonable precautions shall be taken to prevent particulate matter from becoming airborne in accordance with IDAPA 58.01.01.650-651.
- 2.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.
- 2.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable upon receipt of a valid complaint. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.
- 2.4 The permittee shall conduct a monthly facility-wide inspection of potential sources of fugitive emissions, during daylight hours and under normal operating conditions, to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each monthly fugitive emissions inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.
- 2.5 Fugitive emissions shall not be observed leaving the property boundary for a period or periods aggregating more than three minutes in any 60-minute period. Visible emissions shall be determined by EPA Reference Method 22, as described in 40 CFR 60, Appendix A, or by an alternative method approved by the DEQ.

#### **Odors**

- 2.6 No person shall allow, suffer, cause, or permit the emissions of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.
- 2.7 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

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## Visible Emissions

- 2.8 No person shall discharge any air pollutant to the atmosphere from any point of emissions for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gas are the only reason(s) for the failure of the emissions to comply with the requirements of this section.
- 2.9 The permittee shall conduct a quarterly facility-wide inspection of potential sources of visible emissions during daylight hours and under normal operating conditions. The inspection shall consist of a see/no see evaluation for each potential source of visible emissions. If any visible emissions are present from any point of emissions, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in its annual compliance certification and in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each quarterly visible emissions inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

#### Excess Emissions

2.10 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets, and breakdowns.

#### Fuel-Burning Equipment

2.11 The permittee shall not discharge to the atmosphere from any fuel-burning equipment PM in excess of 0.015 grains per dry standard cubic foot (gr/dscf) of effluent gas corrected to 3% oxygen by volume for gas, 0.050 gr/dscf of effluent gas corrected to 3% oxygen by volume for liquid, 0.050 gr/dscf of effluent gas corrected to 8% oxygen by volume for coal, and 0.080 gr/dscf of effluent gas corrected to 8% oxygen by volume for wood products

#### Sulfur Content

- 2.12 No person shall sell, distribute, use, or make available for use any distillate fuel oil containing more than the following percentages of sulfur:
  - ASTM Grade 1 fuel oil 0.3% by weight.
  - ASTM Grade 2 fuel oil 0.5% by weight.
  - Residual fuel oil (ASTM Grade 4, 5, and 6) 1.75% by weight

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2.13 The facility shall maintain purchase records or equivalent from the manufacturer that show the sulfur content of the fuel oil delivered to the facility.

## Reports and Certifications

Any reporting required by this permit, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certifications, shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete. Any reporting required by this permit shall be submitted to the following:

Air Quality Permit Compliance Department of Environmental Quality Twin Falls Regional Office 601 Pole Line Road, Suite 2 Twin Falls, ID 83301 Air Quality Division Department of Environmental Quality 1410 N. Hilton Boise, ID 83706-1255

## Monitoring and Recordkeeping

2.15 The permittee shall maintain sufficient record keeping to assure compliance with the terms and conditions of this permit. Records of monitoring information shall include, but not be limited to, the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

#### Open Burning

2.16 The permittee shall comply with IDAPA 58.01.01.600-616, Rules for the Control of Open Burning.

#### Air Stagnation Advisory Days

2.17 The permittee shall comply with IDAPA 58.01.01.550-562, Air Pollution Emergency Rule.

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#### PAINT BOOTH NOS, 1 AND 2

### 3.1 Process Description

Paint booth no. 1 is primarily used to paint cargo trailer frames. The cargo frames are coated with black primer and black topcoat paint mixtures. Paint booth no. 1 has one stack with a flow of 5,295 cubic feet per minute (cf/m). The booth has been in operation since 1979.

Paint booth no. 2 is primarily used to paint horse trailer frames. The horse trailer frames are coated with white primer and white topcoat paint mixtures. The paint booth no. 2 has two stacks with flows of 5,295 cf/m, each. Paint booth no. 2 has been in operation since 1986.

### 3.2 Control Description

Particulate matter emissions from paint booth Nos. 1 and 2 are controlled by filters. The PM control efficiency of the filters is 96%. The VOC emissions are uncontrolled.

#### **Emissions Limits**

#### 3.3 Emissions Limits

The combined emissions of particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM<sub>10</sub>) and VOC from the paint booth no. 1 and paint booth no. 2 stacks shall not exceed any corresponding emissions rate limit listed in Appendix A of this permit.

## **Operating Requirements**

#### 3.4 Paint Booth Usage Limits

The maximum amount of primer mixture and topcoat mixture sprayed in paint booth no. 1 and paint booth no. 2 shall not exceed 27.3 gallons per day and 9,965 gallons per any consecutive 12-month period. Primer and topcoat mixtures shall include, but not be limited to, white primer, black primer, reducer, and catalyst.

#### 3.5 <u>Filter System Pressure Drop and Maintenance</u>

The static pressure drop across each paint booth exhaust filter shall be maintained within manufacturer specifications. All filter pads shall be replaced in accordance with manufacturer specifications.

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### 3.6 Operations and Maintenance Manual

Within 60 days of issuance of this permit, the permittee shall have developed an operations and maintenance (O&M) manual for the paint booth no. 1 and paint booth no. 2 filter systems. Once completed, the O&M manual shall be submitted to DEQ in accordance with Permit Condition 2.14. The O&M manual shall address the operation, maintenance, and repair of each filter system and shall, at a minimum, include the minimum and maximum pressure drop range across each filter system, methods of preventing malfunctions, and a schedule for routine inspection. The O&M manual shall be maintained on site at all times and shall be made available to DEQ representatives upon request.

## Monitoring And Recordkeeping Requirements

#### 3.7 Recordkeeping Requirements

The permittee shall monitor and record the information listed below in records that shall remain on site for a period of five years. The records shall be made available to DEQ representatives upon request.

- The type and amount of primer mixture and topcoat mixture sprayed in paint booth no. 1 and in paint booth no. 2 in gallons per day and gallons per consecutive 12-month period.
- The pressure drop across the paint booth no. 1 and paint booth no.2 filter systems. The pressure drop shall be recorded once daily, but is not required to be recorded on days when paint booths are not in operation.

#### 3.8 Pressure Drop Monitoring Requirements

The permittee shall install, calibrate, maintain, and operate a pressure drop monitoring device that measures the static pressure differential across the exhaust filters used in paint booth no. 1 and in paint booth no. 2.

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## 4. APPENDIX A – EMISSIONS LIMITS

## Charmac Trailers, Twin Falls

Emissions Limits<sup>a</sup> Daily (lb/day)<sup>b</sup> and Annual<sup>c</sup> (T/yr)<sup>d</sup>

COUDCE	PM <sub>16</sub>		voc	
SOURCE	lb/day	Т/уг	lb/day	T/yr
Paint booth no. 1 (1 stack) Paint booth no. 2 (2 stacks)	29.76	5.43	175.8	32.1

<sup>&</sup>lt;sup>a</sup> As determined by a pollutant-specific EPA reference method, a DEQ-approved alternative, or by DEQ's emissions estimation methods used in the permit application analysis.

b pounds per 24-hour

As determined by multiplying the actual or allowable (if actual is not available) pounds per hour emissions rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates.

d tons per consecutive 12-month period

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## 5. APPENDIX B - FACILITY EMISSIONS INVENTORY

The following table is summary of the air pollutant emissions for the facility based on the potential to emit. The emissions inventory table is for informational purposes only.

## Charmac Trailers, Twin Falls

#### **FACILITY EMISSIONS SUMMARY**

Charmac Trailers, Twin Falls Emissions Summary – Annual (T/yr), Potential to Emit										
Source Description	PM/PM <sub>10</sub>	SO <sub>2</sub>	CO	NO <sub>x</sub>	voc	НАР				
Paint Booth no.1 and no. 2	5.43	-+			32.1	16.5				
Natural Gas-Fired Space Heaters	0.1	0.008	0.53	1.25	0.073	0.025				
Welding Operations	0.027	<b>~-</b>			**	0.001				
Total	5.56	0.008	0.53	1.25	32.17	16.53				

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## 6. TIER II PERMIT GENERAL PROVISIONS

- 1. All emissions authorized herein shall be consistent with the terms and conditions of this permit. The emission of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the *Rules for the Control of Air Pollution in Idaho*, and the Environmental Protection and Health Act, Idaho Code 39-101 et seq.
- 2. The permittee shall at all times (except as provided in the *Rules for the Control of Air Pollution in Idaho*) maintain and operate in good working order all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable laws for the control of air pollution.
- 3. The permittee shall allow the director, and/or his authorized representative(s), upon the presentation of credentials:
  - To enter upon the permittee's premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit; and
  - At reasonable times, to have access to and copy any records required to be kept under the terms and
    conditions of this permit, to inspect any monitoring methods required in this permit, and to require
    stack emissions testing (i.e., performance tests) in conformance with state-approved or accepted EPA
    procedures when deemed appropriate by the director.
- 4. Except for data determined to be confidential under Section 9-342A *Idaho Code*, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of the Department of Environmental Quality.
- 5. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
- 6. In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter; a copy of which shall be forwarded to the director.
- 7. This permit shall be renewable on the expiration date, provided the permittee submits any and all information necessary for the director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit such information within 60 days after receipt of the director's request shall cause the permit to become void.
- 8. The director may require the permittee to develop a list of operation and maintenance procedures to be approved by DEQ. Such list of procedures shall become a part of this permit by reference, and the permittee shall adhere to all of the operation and maintenance procedures contained therein.
- 9. Performance tests (i.e.; air emissions source tests) conducted pursuant to testing requirements in this permit must be conducted in accordance with IDAPA 58.01.01.157. Such testing shall not be conducted on weekends or state holidays unless the permittee obtains prior DEQ approval.

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The permittee shall submit to DEQ for approval a proposed test date for each performance test required by this permit at least 15 days prior to each respective test date (including each test date for periodic tests such as, for example, annual tests). The permittee shall promptly notify DEQ of any change in the proposed test date and shall provide at least five workdays advanced notice prior to conducting any rescheduled test, unless DEQ approves a shorter notice period.

Within 30 days of the date on which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report for the respective test. The performance test report shall include any and all process operating data required to be recorded during the test period as well as the test results, raw test data, and associated documentation.

10. The provisions of this permit are severable; and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.